

# **EXHIBIT 11**

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UNITED STATES DISTRICT COURT  
NORTHER DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

-----X

ORACLE AMERICA, INC.,

Plaintiff,

- against -

GOOGLE, INC.,

Defendant.

CASE NO.: CV 10-03561 WHA

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January 14, 2016

9:42 a.m.

VIDEOTAPED DEPOSITION of HENRIK STAHL,  
taken by Defendant, at the offices of Orrick,  
Herrington & Sutcliffe LLP, 51 West 52nd Street,  
23rd Floor, New York, New York, before Melissa  
Gilmore, a Shorthand Reporter and Notary Public  
of the State of New York.

Job No. CS2210624

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1 say that phone technology has evolved rapidly.  
2 Lots of good examples of that, the radio  
3 technology in phones has certainly improved a  
4 lot with a move from 2G to 3G to 4G in terms of  
5 communication speed and other things.

6 The -- things like the battery, the  
7 amount of power you can get from a battery of a  
8 certain size has evolved massively, which means  
9 that it's now possible to have a phone with a  
10 lot more capabilities and stronger processor,  
11 for instance, or a larger screen than it were  
12 ten years ago.

13 There have also been, you know,  
14 evolutions on usability and other things. Most  
15 of that has been evolutionary rather than  
16 revolutionary. So it's, you know, consistent  
17 technology updates. It seems to have stalled a  
18 little bit lately, though.

19 Q. Has Oracle made any effort to keep  
20 up with the evolving technology for mobile  
21 phones?

22 A. That's a variation of a question you  
23 asked earlier. We are not investing in phones.  
24 We made a conscious decision in the, you know,  
25 2011, 2012 time frame not to invest in software

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1 for phones, except opportunistically if we had  
2 a large customer asking for something specific.

3 Those decisions were based on the  
4 simple observation that we didn't think there  
5 was any market left after Android appeared and  
6 got dominance, and no investments have been  
7 made since, as far as I'm aware.

8 Q. Are you aware -- strike that.

9 Have Oracle's Java ME revenues  
10 declined in the last five years?

11 MS. SIMPSON: Objection to form.

12 A. Yes, without a doubt, yes.

13 Q. And is the reason for the decline  
14 the fact that Oracle hasn't made an effort to  
15 license Java ME in mobile phones?

16 MS. SIMPSON: Objection to form.

17 A. No, that's not the correct way of  
18 stating it. Again, Java ME has been used for a  
19 few different applications. Historically, the  
20 largest revenue source was phones. That  
21 revenue source pretty much started disappearing  
22 when Android upset the kind of Java-based phone  
23 market, if you will.

24 So the reason for decline in revenue  
25 is the appearance and very rapid growth of

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C E R T I F I C A T E

STATE OF NEW YORK )

:ss

COUNTY OF RICHMOND)

I, MELISSA GILMORE, a Notary Public  
within and for the State of New York, do hereby  
certify:

That HENRIK STAHL, the witness whose  
deposition is hereinbefore set forth, was duly  
sworn by me and that such deposition is a true  
record of the testimony given by such witness.

I further certify that I am not  
related to any of the parties to this action by  
blood or marriage; and that I am in no way  
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 19th day of January, 2016.

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MELISSA GILMORE